

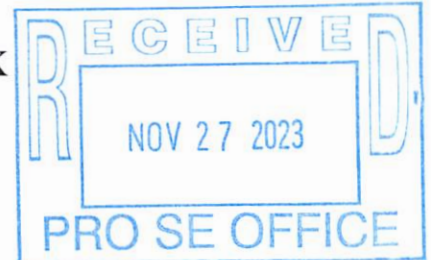
23-cv-8736

Cho, M.J.

ORIGINAL

Case: _____; Document 1, filed by Plaintiff-Petitioner *Pro Se* Yi Sun on 11/22/2023

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



YI SUN,

Plaintiff-Petitioner *Pro Se*

No. _____

-against-

(Amended) **VERIFIED COMPLAINT
AND DEMAND FOR A JURY TRIAL**

1). Hugh H. Mo

& The Law Firm of Hugh H. Mo, P.C. and his accomplice
(including the trafficker-habitual sex offender **Li Da Sun**;
the top Asian uniformed NYPD Officers, who are the members of
'NYPD Asian-American Police Executives Council' (AAPEX);
and the corrupt judges in New York);

2). Tsai Chung Chao (a wolf in Medical Professional's clothing)
and Naturo-Medical Health Care, P.C.

3). New York City Police Department

(include the six Uniformed NYPD Officers, who had sexual assault/abused the Plaintiff in past)

4). Mayor Eric Leroy Adams and the City of New York;
Defendant-Respondent(s)

Plaintiff-Petitioner *Pro Se* Yi Sun, alleges as follows:

I, Yi Sun, the Plaintiff-Petitioner *Pro Se*, declares under penalty of perjury, pursuant to 18 U.S. Code § 1746, that the following is true and correct:

PRELIMINARY STATEMENT

1. This Petition of Verified Complaint/Statement is based on the matters contained herein, on Code of 'Stop Hate Crime acts' provided by 18 U.S. Code §249; And Pursuant to "28 U. S. C. Section 372(c)" or and "Judicial Disciplinary Procedure in the U. S. and Its 50 States"; and the Judicial Conduct and Disability Act of 1980 ("Act"), 28 U.S.C. §§ 351–364. The Highest Federal Judiciary must allow the number of peremptory challenges provided by 28 U.S.C. §1870; and on the supporting Declaration Under Penalty of Perjury of YI SUN attached hereto and filed herewith.

This Verified Complaint is the rape survivor Yi Sun filed a lawsuit against the rapists and their privileged 'behind it' (Calling the shots behind the scenes) on the last day of 'a one-year window' of '**Adult Survivors Act**' (S.66A/a.648A). A state law in New York known as the Adult Survivors Act, which was signed just last year, Governor Kathy Hochul signed the Adult Survivors Act (S.66A/A.648A) on 11/24/2022, creating a one-year lookback window for survivors of sexual assault that occurred when they were over

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the age of 18 to sue their abusers regardless of when the abuse occurred. Earlier this year, that window allowed E. Jean Carroll to bring and win damages in a lawsuit against Donald Trump which was related to an incident in the mid-1990s. The window also just allowed the R&B singer Cassie to sue her former long-term partner, the music mogul Sean Combs, also known as 'Diddy'. Her lawsuit alleges rape and a pattern of abuse.

Plaintiff-Litigant *Pro Se* Yi Sun, who was the rape victim of repeated sexual assault by the serial rapists (six NYPD cops et al) in the City/State of New York. After Yi Sun knew "Me Too" and "The Call Is Yours" through the media on 2018, she felt that it is time for her to step up and be a responsible witness with a brave heart. However, since Yi Sun filed the Verified Complaint against the rapists to the 'New York Supreme Court' (Index No: 108013/2010) and 'New York Southern District Court' (Original District Court Docket: USDC NYSD 2018 CV11002 and USDC NYSD 2019 CV00017), the innocent survivor was bullied, insulted, harassed and 'threatened with death' by the real criminals and their Judge friends under a series of unreasonable punishment. And during the time of case(s), she continuously got unprovoked assault by few different persons when she went to the Courts (in Manhattan) to file the related complaint documents. Yi Sun has reasonable doubts to think that these are the men (from the opponent/Defendants) who attacked the litigant.

For safety reasons, Plaintiff *Pro Se* Yi Sun had to come to the 'United States District Court, Eastern District of New York' at the final day of "a one-year window of 'Adult Survivors Act' (S.66A/a.648A) before this Thanksgiving Day.

Plaintiff Yi Sun's disclaimer: this Verified Complaint/Statement is not malicious, is full of my blood and tears of history. "What Yi Sun require is, that justice be done." I always believe that "In a just society there must be a system whereby people can seek redress through the Courts." My cause is just, and it continues.

2. As a rape survivor, for the last over ten years, Yi Sun continuously made the criminal complaint against these serial rapists and other related co-conspirators to Police Department, DA office and 'New York City Department of Investigation' et al. However, the survivor (victim of repeated sexual assault) was bullied, insulted, harassed by these privileged rapists (or and their attorneys and Judge-friends) under a series of unreasonable punishment with "unspeakable abuse". Especially, after the survivor tried to file a criminal/civil complaint against the habitual sex offenders, Yi Sun was 'court mobbing' and 'threatened with death' by the real criminals and their Judge friends. And Yi Sun got over twice unprovoked assault by the strange persons when she was going to the same Court to file the related documents.

Because of the last twice assault, for the last three years, Yi Sun's right hand still always has pain and inflammation in both wrists that prevents her from writing and lifting, and current she still unable to raise up her left arm after rotator cuff injury (with shoulder dislocation) at the night on 11/5/2020. She is in deep water. The person(s) that are behind this are still out there.

3. For a long time, the law had draconian limits on how women could pursue justice. Especially, the Law has become "plasticine" in the hands of law-breakers in the City/State of New York. It is common for police officers or and judicial staffs to shield each other from punishment, but the phenomenon reaches an extreme in the City of New York, especially the New York City Police Department (NYPD), and the local Judiciary in New York.

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Since Yi Sun got sexual assault multiple times in the past, she is under a great pressure in life. She always felt sad and down nearly all of the time. Nobody understand that the victim/survivor's difficult situation under a fearful life. Yi Sun was a holy woman, innocent and chaste, but after she was got sexual assault and sexual abuse by these bad men (include the six Uniformed NYPD Officers; the trafficker-habitual sex offender Li-Da Sun; and Dr. Tsai Chung Chao, M.D., a wolf in Medical Professional's clothing). The scandal distressed her under a long-term 'rape trauma syndrome'. For the last oven ten years, the psychic scar grew into a castle in her wounded heart. And those psychic scars would never heal.

4. It is the rape survivor/victim's hope that the judicial branches noeffort will be spared to bring Justice to the victim and hold the perpetrators accountable. And the survivor/victim hoped that it will increase its transparency and accountability and get rid of its rubber stamp image.

Preliminary Statement of Facts (this helpless Asian rape survivor's testimony)

5. Roughly 25 years ago, the traffickers increase the supply of trafficked persons through recruitment using deception or coercion. They knew 'Sun, Yi' through the Central Chinese Television (CCTV) and the People's Daily newspaper. The Chinese mass media such as People's Daily, CCTV, China Youth Daily and the P.L.A Daily etc have covered her young living road of frustration on that she pursued difficultly her studies and she kept on her writing in spite of all difficulties.

Original, Yi Sun had been abandoned when she was a baby in China. It was a good person who fostered her and it was the living milk that raised and gave her a literary talent. During her age of 11 to 13, she was went and fostered by a nunnery in consequence of the poor life. Yi Sun studied hard, she beforehand finished the high-education through part work and part study. Later, she became an Arts college student and published her first autobiographical novel <The Past Even of A Girl> what is written on the bases of her own destiny and which was valued by the literary circles in Beijing.

On or about the spring of 1998, the traffickers sent the invitation letter to Yi Sun about "We are delighted to have your registration for the third annual conference of the Houston, Texas chapter of the Association of Authors and Publishers." Being released from military service on June of 1997, she started to work as a journalist and editor of the local paper <Sanya Daily> in Hainan Province.

6. Cheated by the trafficker "Mark/Peter" (legal name: LiDa Sun), Yi Sun came to this country as a newspaper reporter with this I-Visa. She never acquainted with the Chinese man 15 years old and bigger than her, but at the time, "Peter/Mark" (LiDa Sun) forced her to "marry" with him. At the first night after Yi Sun came to the country, he at once resumed his true shape and ravished her, so that she was shamed into "marring" him, but he never tell her that he was a married man at that time.

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“Peter/Mark” (LiDa Sun) purposely hid the facts to the court, the crime facts of three times bigamous marriage and four times of “false marriages to get green card”. Yi Sun did not have a legal marriage with him, and she didn’t have non-marriage cohabitation with him or another man in this country. Yi Sun didn’t want to make a life for him. But he arrested and commanded her, by the magic of a mind long accustomed to awe and to subdue. He always frightened the woman to obey him. But she objected to have the sex with him, so, he always hurt her-----

7. Between June 2, 1998 and or about October 25, 1998, Yi Sun had to live in “Peter/Mark” (LiDa Sun)’s house in Corona of Queens. On July 31, 1998, LiDa Sun would himself up into a rage when she had gone some months pregnant, he punched her and pushed her down a flight of steps before leaving the house. She was bleeding vaginally after the fall, and that her female landlord called an ambulance for her and paged “Peter/Mark” (LiDa Sun) so that he would be aware of his fiancée’s injuries. Yi Sun was taken to Elmhurst Hospital. Because “Peter/Mark” (LiDa Sun) told doctor that her injury were self-inflicted, she was put in the hospital’s mental health unit. She also noted that during this visit to the hospital. She became aware of her pregnancy, and that “Peter/Mark” (LiDa Sun) asked doctor to perform an abortion, but the request was declined because of her health.

On October 25, 1998, “Peter/Mark” (LiDa Sun) has displayed such behavior on numerous prior occasions, including, striking her, about the abdomen with clenched fists and shoed feet and bodily push her down a flight of stairs while, when she was 6 months and more pregnant with the child Michelle---- After that, police came and arrest him. Started from October 25, 1998 to March 14, 2005, Queens Criminal Court and Brooklyn Criminal Court sent continual order of protection to Yi Sun.

Hugh H. Mo was the personal Attorney for the Defendant Li Da Sun in his criminal case. The bad Attorney abetted his client to use the threat of violence against Yi Sun (a victim and witness), physically assaulted, harassed or and intimidated her. Beside, Hugh H. Mo abetted his client to report false cases to and sued Yi Sun to NYPD or and ACS (complaint about ‘Child Neglect’ of “Abuse or Maltreatment”).

8. On February 25, 2000, “Peter/Mark” (LiDa Sun) came to Yi Sun’s home at “6116 3rd Avenue, Brooklyn, NY 11220” and became physically abusive by punching her, kicking her on the ribs (causing internal bleeding), and by hitting me with a hammer on her face, bruising four teeth.

On March 3, 2000, “Peter/Mark” (LiDa Sun) verbally abused Yi Sun by cursing yelling obscenities and making threats at her. He physically abused her by punching her on the face, banging my head against the wall and the door frame. She sustained bruises on her neck and face due to the assault.

This year, “Peter/Mark” (LiDa Sun) has reported false cases to and sued Yi Sun to NYC Administration for Children’s Services (ACS) six times. He also has harmed himself to frame Yi Sun in police Precinct tens of times. Without any choices, Yi Sun (with her daughter Michelle, a child under one year of age) had to move time and again.

9. On October 4, 2003, ‘Li Da Sun’ found an excuse to get something from Yi Sun’s home at 339 40th Street, Brooklyn, NY 11232. At her home, he injured his head

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using a hammer. Then he reported to 72nd Precinct. Yi Sun was arrested. She was released after investigation. After this case, Yi Sun moved again with her daughter Michelle to Flushing of Queens from Brooklyn.

On November 17, 2003, Yi Sun had moved to Flushing of Queens for one, 'Li Da Sun' made several false reports to accuse her that she used scissors to kill him on November 22, 2003. Yi Sun almost was arrested by 109th Precinct.

Because the two cases, Yi Sun met the supervisor detective 'Det. Bryan Trockel' at 72nd Precinct and another detective 'Det. Steven Matthews' at 109th Precinct, the two detectives raped her and extorted sex and money from her in order for her to stay out of jail (and keep her four-year old daughter Michelle) when 'Hugh H. Mo, Esq' abetted 'Li Da Sun' to report false cases to and sued Yi Sun (a victim and witness) to ACS and NYPD for more times. (complaint about 'Child Neglect' of "Abuse or Maltreatment").

10. To put an end to the family misfortunes, Yi Sun would join the U.S. Army or U.S. Navy to change destiny in future. Started on summer of 2004 and 2012, she many times contacted with the recruiter, later she took the recruitment examination (US Army ASVAB Practice Test) after I became a United States Permanent Resident. But an unexpected reverse again came to her. Yi Sun had a neck and back injuries in her work place on June 28, 2008. The medical specialist Dr. Tsai Chung Chao M.D was the WCB doctor. She got sexually assaulted (after an injection by the bad doctor) in his clinics.

Tsai Chung Chao is a wolf in Medical Professional's clothing. As far as we knew, the old medical doctor was a pervert, molesting female patients in his doctor's office, treatment room or clinics. Beside, the bad doctor often forced his female patients to engage in sexual activity in exchange for medication and medical treatment, while at his clinics, office, apartment, or and the victims' apartment.

During the period of January 13, 2008 through on or about August 20, 2009, the medical specialist Dr. Tsai Chung Chao M.D. more times injected his female patient with what is believed to be a narcotic and sexually assaulted the victim.

. After Yi Sun found the unidentified spots (semen) in her body (by Dr. Chao's injection), she believed that the medical specialist (Dr. Tsai Chung Chao M.D) injected his female patient with what is believed to be a narcotic and sexually assaulted the victim in past. Yi Sun reported to police about the bad doctor's misconduct and criminal offense; and she send a complaint to "New York State Department of Health, Office of Professional Medical Conduct" (OPMC NY-09-10-6712A) on October 13, 2009.

Hugh H. Mo was the personal Attorney for the Defendant Li Da Sun in his criminal case. The bad Attorney abetted his client to use the threat of violence against Yi Sun (a victim and witness), physically assaulted, harassed or and intimidated her. Beside, Hugh H. Mo abetted his client to report false cases to and sued Yi Sun to NYPD or and ACS (complaint about 'Child Neglect' of "Abuse or Maltreatment"). many more times.

11. On June 17, 2010, Yi Sun filed a law suit against Dr. Tsai Chung Chao, M.D about his sexual assault and medical malpractice to the 'New York County Supreme Court.' (Index No: 108013/2010).

Between on 06/17/2010 and 4/25/2018, the bad doctor (a wolf in Medical Professional's clothing) Tsai Chung Chao's personal Attorney and good friend 'Hugh H. Mo, Esq' used a series of tricks to stop or dismiss the trial jury in the case.

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During the period of August 27, 2009 through on or about March of 2015, Hugh H. Mo, Esq again abetted his criminal client to report false cases to and sued Yi Sun (sexual assault survivor; litigant) to ACS (NYC Administration for Children's Services) or and NYPD (New York City Police Department, 109th Precinct, 13th Precinct, 5th Precinct, 1st Precinct and 'NYS University Police' etc) over 30 times. As a result of the false reports made by Dr. Tsai Chung Chao or and his personal attorneys Hugh H. Mo, Yi Sun was taken into custody and detained without cause at the 13th Precinct twice on or about August 26, 2009 and June 12, 2010, at the same time, her daughter (Michelle Sun, a child under 12 year of age) was taken away from her care for ACS----

12. THE PARTIES

1). Plaintiff-Petitioner *Pro Se* Yi Sun is a former journalist and editor, author, and a former jewelry designer before her last injured few years ago. She is resident and domiciliary of the State of New York.

2). The Defendant-Respondent **Hugh H. Mo** is a former Deputy Commissioner of New York Police Department, a former District Attorney of New York county; and current he still is an Arbiter of "New York State Commission on Judicial Conduct", and a member of "Police Training Advisory Board" of New York City Police Department; beside, he is the founder of the "NYPD Asian-American Police Executives Council" (AAPEX). Hugh H. Mo is the Principal at the 'Law Firm of Hugh H. Mo, P.C.', located at '225 Broadway, Suite 2702, New York, New York 10007'. Hugh H. Mo is resident and domiciliary of the State of New York.

3). For all I know, Hugh H. Mo's other accomplices: including the trafficker-habitual sex offender Li Da Sun; the top Asian uniformed NYPD Officers, who are the members of 'NYPD Asian-American Police Executives Council' (AAPEX); (and the corrupt judges in the City/State of New York); they all is/are resident(s) and domiciliary of the State of New York.

4). The Defendant 'Tsai Chung Chao' is a wolf in Medical Professional's clothing. He is the Founder of 'Naturo-medical Health Care, P.C of New York'; and he is/was the clinical associate professor and attending physician, Department of Orthopedics and Rehabilitation Medicine; director, rehabilitation Medicine Certificate Program; Director, Physicians' Medical Acupuncture Certificate Program at SUNY downstate Medical Center. Tsai Chung Chao is resident and domiciliary of the State of New York.

5). The Defendant 'New York City Police Department' (NYPD) is the primary law enforcement and investigation agency within the five boroughs of New York City. The NYPD Police Headquarters located at '1 Police Plaza Path, New York, NY 10007'.

The six Uniformed NYPD Officers (who has abused a same innocent female in past), their names is: the first policeman-Det. Steven Matthews; the second policeman-Det. Bryan Trockel; the third policeman-Det. Bruno Vidal; the fourth NYPD policeman "Sam Tsang"; the fifth policeman, who was the detective or supervisor in 72 Precinct; the sixth policeman-Lieutenant Timothy Cai.

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For all I know, they (The six Uniformed NYPD Officers) all was/is resident(s) and domiciliary of the State of New York, only the former NYPD Detective 'Steven Matthews' was resting in peace on or about May 4, 2015.

6) The Defendant-Respondent **"the power of 'New York City Police Department' (NYPD) (include the Mayor Eric Leroy Adams, and the NYPD Commission et al)", is/are resident(s) and domiciliary of the State of New York.**

The Mayor Eric Leroy Adams, is an American politician and former police officer, serving as the 110th mayor of New York City since 2022. Adams was an officer in the New York City Transit Police and then the New York City Police Department for more than 20 years, retiring at the rank of captain. His bias for criminal cops and friends was obvious, and his partial attitude called forth a lot of criticism. He elevated many of his friends to powerful positions within the City Government; he even elevated the retired NYPD Detective of 'criminal sexual conduct' as a "NYC Special Commissioner of Investigations". It is common for police officers or and the legal profession to shield each other from punishment, but the phenomenon (especially Judicial corruption include 'Judicial fraud' and collusion etc) reaches an extreme in the City of New York especially the New York City Police Department and the Justice system in New York.

FACTUAL ALLEGATIONS

I. A bloody allegation: "You have made my life a living hell."

Since the single woman got sexual assault by the six Uniformed NYPD Officers and the 'werewolf-doctor (a wolf in Medical Professional's clothing) et al. For the last over ten years, the psychic scar grew into a castle in the helpless survivor (Yi Sun)'s wounded heart, and those psychic scars would never heal.

13. The Complainant Yi Sun (Plaintiff-Petitioner *Pro Se*)'s testimony:

(1) "I was a holy woman, innocent and chaste. I once have a clear conscience in my life. Original, I had been abandoned when I was a baby in China. It was a good person who fostered me and it was the living milk that raised and gave me a literary talent. During me age of 11 to 13, I was went and fostered by a nunnery in consequence of the poor life. I was innocent and hard working. I studied hard so that I beforehand finished the high-education through part work and part study. In January 7, 1991, I joined the army and served in the production base of the Air Force as a military news reporter when I was a 16-year old literature college student. The truth, goodness and beauty of the literature are the purpose that I pursues, so disregarding the long way and arduous work conditions, I has lived in the region of Tibet and the frontier stations where I tried to understand the life of Tibetan and the soldiers. During that time, I braved the severe cold and wrote 680 articles about news and literature. The Chinese mass media such as People's Daily, CCTV, China Youth Daily and the P.L.A Daily etc have covered my young living road of frustration on that I pursued difficultly my studies and I kept on my writing in spite of all difficulties. On August of 1993, I published my first autobiographical novel <The Past Even of A Girl> what is written on the bases of my own destiny and which was valued by the literary circles in Beijing. Then, I had composed the novel <The Rebel> and the poetry <An Unfinished Story> that could prove my young literary talent.

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(2) My first traveling abroad was a nightmare. I was trafficked from China, Hainan. On April 14, 1998, they sent the invitation letter (with a round-trip ticket) to me about “We are delighted to have your registration for the third annual conference of the Houston, Texas chapter of the Association of Authors and Publishers.” My all former colleagues of newspaper felt that this was a good thing, and support me to go to Amercian for the conference in Houston. Cheated by the bad persons, I came to this country as a newspaper reporter with this I-Visa. At the first night after I came to the country, the trafficker “Peter/Mark” (LiDa Sun) picked me up at the airport, then he drove me to the “meeting place” at his housing in Queens. I never acquainted with the Chinese man 15 years old and bigger than me, but at the time, he forced me to “marry” with him. He has sexual intercourse with the ‘former little nun’ (Yi Sun) against her will. I objected to have the sex with him, so, he always hurt me-----

The habitual sex offender often took nude photo and record videos to me when I was sleeping (without permission). He showed these pictures and videos to others, and he forced me to walk around without wearing in front of him, and he intentionally tried to touch my personal parts, he told his friends and others that “I held the door for her, and smiled.” I wanted to leave here and return to my work place, I asked him to give me back the passport, but he always threatened to report to Police to arrest me, he said that “the cops will come to put you into the jail if I showed your uniformed pictures to them.”

I had beed his slave for six months until the Police came and arrest him (for his ‘Violent Crime’ and ‘Assaulting a Police officer’ etc) at the midnight on October 25, 1998.

Explain: On October 25, 1998, “Li Da Sun” has displayed such behavior on numerous prior occasions, including, striking me, about the abdomen with clenched fists and shoed feet and bodily push me down a flight of stairs while, when I was 6 months and more pregnant with the child Michelle---- After that, police came and arrest him. Started from October 25, 1998 to March 14, 2005, Queens Criminal Court and Brooklyn Criminal Court sent continual order of protection to me. I moved to a small studio near ‘Elmhurst Hospital Center’ from the scene of the incident. After the kid was born, I decided to move to Brooklyn with the little baby.

(3). I was a domestic violence victimized woman who had experienced a long term physical and emotional abuse by the “fiancé” LiDa Sun (he always used this name “Peter/Mark”). Started from October 25, 1998 to March 14, 2005, Queens Criminal Court and Brooklyn Criminal Court sent continual order of protection to me. But ‘Li Da Sun’ often came my place and told my landlord and neighbors and colleagues about ‘he is my fiancé’. And he always used his position as a “family member” to molest me----

On February 25, 2000, ‘LiDa Sun’ came to my home at “6116 3rd Avenue, Brooklyn, NY 11220” and became physically abusive by punching me, kicking me on the ribs (cursing internal bleeding), and by hitting me with a hummer on my face, bruiking four teeth.

On March 3, 2000, LiDa Sun verbally abused me by cursing yelling obscenities and making threats at me. He physically abused me by punching me on the face, banging my head against he wall and the door frame. I sustained bruises on my neck and face due to the assault.

This year, LiDa Sun has reported false cases to and sued me to ACS (NYC Administration for children’s Services) many times. He also has harmed himself to frame me in police precinct tens of times. Without any choices, my daughter Michelle and I had to

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move time and again. I was heartsick that I did not see his poor behavior before I came to this country.

(4) Later, I knew that it's LiDa Sun's personal attorney Mr. Hugh H. Mo, Esq abetted him to do so. Because on or about October of 2009, the same Attorney (Hugh H. Mo, Esq)'s another client 'Tsai Chung Chao' (a wolf in Medical Professional's clothing) reported false cases to and sued me to ACS (New York City Administration for Children's Services) and NYPD (New York Police Department) for more times too. This revolutionary idea was the same as LiDa Sun. On or about 2012, I once received a letter by Email from LiDa Sun, who told me that it's Dr. Chao's personal Attorney 'Hugh H. Mo, Esq' abetted him and them to do so and reported false cases to and sued me to ACS and NYPD (complaint about 'Child Neglect' of "Abuse or Maltreatment").

During in these cases, these bad detectives raped me and extorted sex and money from me in order for me to stay out of jail and keep my child Michelle when another rapist reported false cases to and sued me to ACS (New York City Administration for Children's Services) and NYPD (New York City Police Department) for more times.

(5) I did not want LiDa Sun estering me in the street anymore, but the man kept to make trouble to me. From December of 1998, through March of 2005, 'LiDa Sun' reported false cases to and sued me to ACS and NYPD for 30 more times. I had to move house bring the child more times and again at during the several years of "legal separation".

On October 4, 2003, "separated" LiDa Sun found an excuse to get something from my home at 339 40th Street, Brooklyn, NY 11232. At my home, he injured his head using a hammer. Then he reported to 72nd Precinct. I was arrested. I was released after investigation. After this case, I moved again with my daughter Michelle.

On November 17, 2003, I had moved to Flushing of Queens for one week, LiDa Sun made several false reports to accuse me that I used scissors to kill him on November 22, 2003. I almost was arrested by 109th Precinct.

Because the twice NYPD complaint(s), I met the supervisor 'Det. Bryan Trockel' at 72nd Precinct (in Brooklyn) and 'Det. Steven Matthews' at 109th Precinct (in Flushing of Queens), the two detectives raped me and extorted sex and money from me in order for me to stay out of jail and keep my daughter Michelle when LiDa Sun reported false cases to and sued me to ACS and NYPD (complaint about 'Child Neglect' of "Abuse or Maltreatment"). for more times.

(6) After that, the sluices of 'alleged assault' had already been opened, and with every time the floods, were spreading. A series of 'previous assaults' is repeated at least twice. I had remembered in minute detail everything that had happened. There sexual abuse was a total nightmare. They had made my life a living hell.

I was a holy woman, innocent and chaste, but after I was got sexual assault and sexual abuse by these bad men. The scandal distressed me under a long-term 'rape trauma syndrome'. For the last oven ten years and more, the psychic scar grew into a castle in my wounded heart. Those psychic scars would never heal.

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II. The complaint (Rape victim) was continuously subjected to intimidation or humiliations by IAB (Internal Affairs Bureau of NYPD)

The NYPD always treats allegations of sexual assault and rape “extremely seriously”, and did everything they could to shake off the guilt of the six Uniformed NYPD Officers (who has abused the same innocent female in past), **Instead, the rape victim have been repeatedly subject to legal harassment; and during the time of ‘IAB investigation’, the Complainant were continuously subjected to intimidation or humiliations from these ‘privileged rapists’ er al.**

14. In principle, the Internal Affairs Bureau (IAB) is dedicated to preserving integrity, which is critical to the function of the Police Department, and fighting corruption within the NYPD. IAB helps to ensure that trust by detecting, investigating, and bringing to justice the small number of New York City police officers and civilians who engage in misconduct and corruption.

Anyhow, Rape (sexual assault) is a vile and loathsome crime. These Uniformed NYPD officers (who had abused a same innocent female in past) and their accomplices must not be allowed to exploit loopholes in existing law and thus escape responsibility for their actions. However, after my personal experience in past, I felt that the IAB (Internal Affairs Bureau of NYPD) has two kinds of eye however to this Asian law-abiding complaint/victim Yi Sun (disadvantaged ethnic minority) and other all abiding residents two kinds of measure, this Asian complaint/victim Yi Sun resembles “the child of stepmother” often undergo unfair treatment. And many times in past, the victim was continuously subjected to intimidation or humiliations by these IAB inspectors (when the police IAB inspectors asked me to describe exactly how it happened).

The rape survivor/victim’s testimony is full of her blood and tears of history_____

15. From November 22, 2003, through September of 2013, Plaintiff got sexual assault and sexual abuse by the six bad uniformed policemen (Det. Steven Matthews; Det. Bryan Trockel; Det. Bruno Vidal; Det. A. S; the assistance of Commanding Officer Sam Tsang; Lieutenant Timothy Cai); Beside, another there bad men is ‘LiDa Sun’; ‘Dr. Tsai Chung Chao, M.D’; Scott Richman.

Original Plaintiff Yi Sun was a victim and witness in the criminal case at ‘Queens Criminal Court’ and ‘Brooklyn Criminal Court’ (Docket No: 98Q054580; Docket No: 2000QN021737; and Docket No: 99K065479; Docket No: 2000KN031338; Docket No: 2000K000741etc). Hugh H. Mo was the personal Attorney for the Defendant (Li Da Sun) in his criminal case. The bad Attorney abetted his client to use the threat of violence against Yi Sun (a victim and witness), include physically assaulted, harassed or and intimidated this victim/witness. Beside, Hugh H. Mo abetted his client to report false cases to and sued Yi Sun to NYPD or and ACS many more times.

During the time of ‘investigation’ in the complaint of ACS case (about ‘Child Neglect’ of “Abuse or Maltreatment”). The uniformed NYPD detective(s) knowingly used his/their position(s) for personal financial gain in the case(s), which was the detectives raped me and extorted sex and money from me in order for me to stay out of jail and keep my daughter Michelle (when the criminal Defendant’s personal Attorney abetted his clients many times to report false cases to and sued the victim/witness to NYPD or and ACS about her “Child Neglect” of “Abuse or Maltreatment” etc). After Plaintiff got sexual assault and sexual abuse

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by the uniformed policeman/policemen, she always immediately reported to the local Precinct, but she never get any NYPD Police Complaint report or any short note about the matter. Plaintiff had to contact with 'NYC Civilian Complaint Review Board' (CCRB) to file 'CCRB complaint' against the bad uniformed NYPD Officers' misconduct. But after a time, the investigation into the 'sexual aggression of NYPD detective' has gone nowhere after the 'CCRB complaint' removed to the NYPD 'Chief Department'. Later, the power(s) of NYPD (include the NYPD Commission, Chief department et al) always use his/her power of position to deny/dismiss/close the CCRB complaint(s) under 'dismiss with prejudice' and the 'investigations proceedings' had been rigged.

16. Police is a respectable and elevated profession, a barrister owes the duty should to his/her every resident. As a police officer or detective, especially 'police detective of special victim squad', it is your duty to protect your resident and victim from harm, and this duty is paramount to all the others. Cops should be committed not only every resident, but also to judicial system and justice. Law was an order of peace founded on fairness. The first of all laws is to respect the laws. But in fact, the Law has become "plasticine" in the hands of law-breakers in the City/State of New York. It is common for police officers or and judicial staffs to shield each other from punishment, but the phenomenon reaches an extreme in the City of New York, especially the New York City Police Department (NYPD), and the local Judiciary in New York.

The New York City Police Department (NYPD), is the primary law enforcement agency within New York City. Established on May 23, 1845, the NYPD is the largest, and one of the oldest, municipal police departments in the United States. As a "one of the largest and oldest municipal police departments" in the United States, in NYPD cronyism is even more ingrained. Corruption is rampant, with government officials accused of cronyism and drug trafficking. The NYPD has a history of police brutality, corruption, and misconduct, which critics argue persists into the present day. Beside, Racial discrimination is rampant in the NYPD and related field of law enforcement and justice.

In the investigation into the "bad uniformed NYPD Officers' misconduct", especially in the complaint of 'sexual aggression of NYPD detective', the investigative process should be designed to prioritize the protection of witnesses against intimidation and violence; and the investigative process must be just, objective and reliable; and ensure that its investigative process is transparent. But during all the time of my visit with them (IAB inspectors or and 'Special victim squad' detectives) in past, I deeply felt that they always knowingly made secondary victimization to the victim during the investigative process; beside, they always tried the best to justify these uniformed NYPD Officers and their misconduct. It't deeply hurt the victim's feeling and negated the benefits/right/justice for the rape victim.

III. The 'IAB of NYPD' tried to distort the rape cases facts, to conceal the truth, to confound right and wrong, to gloss over the crimes of these privileged rapists (The six Uniformed NYPD Officers, who had sexual abused the same innocent female in past) **and to glorify its aggression-----**

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17. In principle, the IAB (Internal Affairs Bureau of NYPD) is dedicated to preserving integrity, which is critical to the function of the Police Department, and fighting corruption within the NYPD; IAB helps to ensure that trust by detecting, investigating, and bringing to justice the small number of New York City police officers and civilians who engage in misconduct and corruption. Their duty shall be spared to bring Justice to the victim and crush the ‘black sheeps’ of the NYPD. But in fact, their behavior was, in a word, shocking!

These names of informations about the ‘black sheeps’ in NYPD:

- (1) **Det. Steven Matthews**, police detective,
who worked at 109th Precinct on 11/23/2003, 12/12/2003 and 12/25/ 2005;
- (2) **“John Doe”**, three police inspectors of ‘NYPD Internal Affairs’,
who worked at the IAB office in Queens on January of 2005;
- (3) **Det. Bryan Trockel**, police detective, who worked at 72nd Precinct on January 1, 2004;
- (4) **“John Doe”**, three police inspectors of ‘NYPD Internal Affairs’,
who worked at the IAB office in Brooklyn on January of 2005;
- (5) **Det. Bruno Vidal**, police detective,
who worked at 90th Precinct on August 15, 2008, August 26, 2008;
- (6) **Sgt. Thomas Spitzfaden**, a Sergeant of NYPD Internal Affairs,
who worked at the IAB office in Brooklyn on September and January of 2005;
- (7) **Sgt. Zichao Chen**, a Sergeant of NYPD Internal Affairs,
who worked at the IAB office in Brooklyn on September and January of 2005;
- (8) **Sam Tsang**, the “assistance of Commanding Officer” in 61 Precinct,
who worked at 61 Precinct from August of 2008 to current;
- (9) **“John Doe”**, three police inspectors of ‘NYPD Internal Affairs’,
who worked at the IAB office in Brooklyn on January of 2005;
- (10) **“John Doe”**, police detective, who worked at 72nd Precinct on September of 2004;
- (11) **Lt. Timothy Cai**, a police lieutenant, who worked at 108th Precinct on June 27, 2013;
- (12) **Sgt. Marni Schwager**, a Sergeant of NYPD Internal Affairs,
who worked at the IAB office in Queens on September 24, 2013;
- (13) **Sgt. Jessie Pan**, a Sergeant of NYPD Internal Affairs,
who worked at the IAB office in Queens on September 24, 2013;
- (14) **Sgt. Stephanie Artinez**; a Sergeant of NYPD Internal Affairs,
who worked at the IAB office in Queens on September 24, 2013;
- (15) **D.I. Sylrester Ge**, a Deputy Inspector of NYPD Internal Affairs,
who worked at the IAB office in Queens on December 23, 2013;
- (16) **Lt. “Joan Doe”**, a White lieutenant of NYPD Internal Affairs,
who worked at the IAB office in Queens on December 23, 2013;
- (17) **“John Doe”**, two police inspectors of ‘NYPD Internal Affairs’,
who worked at the IAB office in Queens on December 23, 2013;
- (18) **Det. Michael Rama**, a police detective,
who worked at ‘Manhattan Special Victims Squad of NYPD’ on July 26, 2011;
- (19) **Det. Maddy Acevedo**, a female police detective,
who worked at ‘Manhattan Special Victims Squad of NYPD’ on May 7, 2018;
- (20) **Lt. “Morang”**, a police lieutenant,
who worked at ‘Manhattan Special Victims Squad of NYPD’ on October 3, 2018.

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Beside,

(21) **Hugh. H. Mo**, a member of “Police Training Advisory Board” of New York City Police Department and a former NYPD Deputy Commissioner of trials, who worked at New York City Police Department from May of 1984 to current. Hugh. H. Mo is the founder of the “NYPD Asian-American Police Executives Council” (AAPEX). These all members of AAPEX are NYPD Captain, NYPD Deputy Inspector, NYPD Inspector, Deputy Chief, Assistant Chief, Bureau Chief, or the Assistant for ‘Chief of Department’ and Commission, they seems all are the ‘Commanding Officer’ of Precincts in ‘New York City Police Department’. In fact, the AAPEX became the personal property of ‘Hugh H. Mo & The Law Firm of Hugh H. Mo, P.C.’

18. FACTS ¹:

State here briefly the FACTS that support your case. Describe what happened, how were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

1). The first policeman Det. Steven Matthews, who drove Plaintiff Yi Sun to his home from 109th Precinct and raped her.

Background:

Plaintiff *Pro Se* Yi Sun was a victim and witness in the criminal case at ‘Queens Criminal Court’ and ‘Brooklyn Criminal Court’ (Docket No¹: 98Q054580; Docket No²: 2000QN021737; and Docket No³: 99K065479; Docket No⁴: 2000KN031338; Docket No⁵: 2000K000741etc). Hugh H. Mo was the personal Attorney for the Defendant (Li Da Sun) in his criminal case. The bad Attorney abetted his client to use the threat of violence against Yi Sun (a victim and witness), include physically assaulted, harassed or and intimidated this victim/witness. Beside, Hugh H. Mo abetted his client to report false cases to and sued Yi Sun to NYPD & ACS (complaint about ‘Child Neglect’ of “Abuse or Maltreatment”) for more times.

Yi Sun’s testimony with full of her blood and tears:

a). On October 4, 2003, ‘LiDa Sun’ found an excuse to get something from my home (located at ‘339 40th Street, Brooklyn, NY 11232). At my home, he injured his head using a hammer. Then he reported to 72nd Precinct. I was arrested. I was released after investigation. After this case, I moved again with my 4 years old daughter Michelle.

On November 17, 2003, I had moved to Flushing of Queens for one week, LiDa Sun made several false reports to accuse me that I used scissors to kill him on November 22, 2003. I almost was arrested by 109th Precinct.

Because the case, I met the supervisor Det. Bryan Trockel at 72nd Precinct (in Brooklyn) and Det. Steven Matthews at 109th Precinct (in Flushing of Queens).

b). On December 12, 2003, I returned to 109th Precinct in the complaint of ‘murder’. I told Police about “I never use scissors to kill LiDa Sun on 11/22/2003, Saturday. Because I was in the ‘bookkeeping classroom’ at school all day; Det. Steven Matthews told me that he can help me after the investigation. Then he drove me to his home and raped me. Det. Matthews gave me wine to drink, but I never had alcohol before, I passed out, when I woke up, I was naked on his bed.

On December 25, 2003, Det. Steven Matthews called me and said that he need talk with me about the “criminal case”, then he picked me up and drove me to a hotel, where

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he gave me more wine and had intercourse with me. I entreated him piteously to let me go. But clearly he wasn't ready to let me off.

c). After I got the sexual assault by Det. Matthews on December 12, 2003 and December 25, 2003, I became pregnant with Det. Matthews' child and aborted it on February 14, 2004. Det. Steven Matthews called me many more times and forced me to abort it (when he knew this thing). On or about February 14, 2004, Saturday, Det. Steven Matthews asked his girlfriend "Jenny" to pick me up and drove me to a private gynecological clinic for abortion in Chinatown. I once took a lot of flak for my stand against abortion. But I had to obey the Detective after he faced me. At the time, someone told me that if I filed a complaint against the police, I may no longer able to see my daughter Michelle, whom I lost custody of after attempting suicide.

d). After that, I made some complaint in phone against Det. Steven Matthews. On October 14, 2004, I filed a complaint as a walk-in at the 'NYC Civilian Complaint Review Board' (The CCRB Case No: **200512325**). But later, after the 'CCRB complaint' removed to the NYPD 'Chief Department' and IAB (Internal Affairs Bureau of NYPD), the complainant-victim Yi Sun was bullied, insulted, harassed and intimidated by the real criminals and their friends (police inspectors of 'NYPD Internal Affairs'). On or about January of 2005, three IAB policemen ("**John Doe**", three police inspectors of 'NYPD Internal Affairs') paid a surprise visit; they came to my old living place (located at '143-30 Cherry Avenue, 3 Floor, Flushing, New York 11355'). They threatened me when I asked the two IAB cops to bring me to see the District Attorney, but they tried to send me to the Emergency Department of 'Elmhurst Hospital Center' and want me in the Psychiatry. But the Psychiatrist believed me and objected the two IAB cops' request in the time. Then I immediately leaved here and went home.

19. FACTS ²:

2) The second policeman Det. Bryan Trockel, who drove Plaintiff Yi Sun to a parking from 72nd Precinct and raped me in his car on New Year of 2004 (January 1, 2004)

Yi Sun's testimony:

a). Between the period of 'January 2002' and 'January of 2004', I encountered the detective supervisor at the 72nd Precinct by the name of 'Bryan Trockel' three times. During this period, LiDa Sun made numerous false allegations of assault against me in the 72nd Precinct. I was arrested but was cleared each time after their investigation.

On or about October 4, 2003, LiDa Sun found an excuse to get something from my old address (located at '339 40th Street, Brooklyn, New York 11232'). At my home, he injured his head using a hammer. Then he reported to 72nd Precinct. I was arrested. I was released after investigation. After this case, I moved again with my daughter Michelle.

On or about October 4, 2003, Det. Bryan Trockel gave me a business card, he wrote that **"If there is a complaint filed against this woman, please beep me. Thanks. Det. Trockel"** in the card's back.

b). On January 1, 2004, New Year, I brought a cake as a gift to the 72nd Precinct (in Brooklyn) for the supervisor Det. Trokel and other officers who had helped clear my arrest. Det. Trockel took me out from the 72nd Precinct and into a patrol car. Det. Trockel and

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me drove to and parked under a highway overpass between 3rd and 4th Avenue. I believed him, so I tried to talk with him about the current troubles (after I moved to Flushing from Brooklyn on 11/17/2003), which was the bad man Li Da Sun again made several false reports against me, and the Det. Steven Matthews (109th Precinct in Flushing) was always pestering me to visit with him----I was/am a timid woman, I was embarrassed to tell the supervisor Det. Trokel that “Det. Matthews often called me and came to my place, he asked me to go to his house and sleep with him together.” Teant choked my words. Sobbed me, “I don’t like this.”

But at the time, Det. Trockel still took off my trousers and raped me in his car. I was crying with sad after the incident was over, Det. Trockel told me that he had a crush on Yi when he first time met me two years ago; he said that “I have always love you, I haven’t a wife. I can’t wait to spend the rest of my life with you.”

c). Between January 1, 2004 and May of 2004, Det. Trockel asked me to become involved with him and he promised that he will marry with me soon.

During the times, I was not interested in him “that way” anymore. But Det. Trockel often forced me to sex with him in his car because of his out-of-control sexual behaviors. Det. Trockel often called me and said that: “Yi, Are you hungry? My banana is waiting for you.” In the every visit time, he just wanted to make love with me in his work time. Sometimes Det. Trockel was like a rabbit hopping on and hopping off. He asked another detective to keep a watch for him during their love-making. I once had a severe vaginal bleeding after Det. Trockel forced me to sex with him. He refused me to go to hospital, so that he can protect his private matter which he will never tell anyone.

d). On December of 2004, I second time came to Police Department and reported to them about the two bad detectives (Det. Det. Bryan Trockel and Det. Steven Matthews)’s wrongdoings. But the IAB (Internal Affairs Bureau of NYPD) always stand up their colleagues (Det. Det. Bryan Trockel and Det. Steven Matthews.), the police inspector of IAB Queens office even tried to send me to mental hospital after they came to my place in Flushing, but the psychiatrists of Elmhurst Medical Centre believed my statement and refused their request to let me to stay in the psychiatry.

e). On February 15, 2005, I came to CCRB (NYC Civilian Complaint Review Board) and filed a complaint against Det. Bryan Trickel’s sexual misconduct. (CCRB Case No: 200501666). But after a time, the investigation into the ‘sexual aggression of NYPD detective’ has gone nowhere after the ‘CCRB complaint’ removed to the NYPD ‘Chief Department’. Current I do not find my CCRB complaints in the records of ‘**New York Civil Rights Law § 50-a**’. I believe that the power(s) of NYPD (include the NYPD Commission, Chief department et al) always use his/her power of position to deny/dismiss/close the CCRB complaint(s) under ‘dismiss with prejudice’ and the ‘investigations proceedings’ had been rigged.

IV. The inspectors of NYPD ‘Internal Affairs Bureau’ forced the victim to withdraw the complaint against the detective’s sexual assault, which was their rule for taking action to prevent and address the ‘uniformed NYPD Officers sexual misconduct

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As the “one of the largest and oldest municipal police departments” in the United States, the NYPD has a history of police brutality, corruption, and misconduct, which critics argue persists into the present day. Allegations of sexual misconduct by the Uniformed NYPD Officers are still heard despite the NYPD Commission’s declared zero-tolerance policy. In Plaintiff Yi Sun’s cases in past, the survivor felt that “When it comes to this, NYPD talks the talk but they doesn’t walk the walk.” Instead, the rape victim had been repeatedly subject to legal harassment; the IAB inspectors forced the victim to withdraw the complaint against the detective’s sexual assault, it’s their rule for taking action to prevent and address the ‘uniformed NYPD Officers sexual misconduct.

20. FACTS ³:

3) The third policeman Det. Bruno Vidal, who came to Plaintiff’s home from 90th Precinct and raped her twice at the same morning on 8/28/2008
Plaintiff Yi Sun’s testimony with full of her blood and tears:

a). Because the ACS case, I need moved to another living place from the old address (located at 143-30 Cherry Avenue, Flushing, Y11355) which was a kindergarten.

On or about August 15, 2008, I was moving my residence from ‘286 Broadway in Brooklyn’, to ‘1060 64th Street’ in Brooklyn. I found four boxes of new clothes etc was stolen by the moving company. I went to report the crime at the 68th precinct where I was told that my report should be filed at the 90th Precinct. On August 26, 2008, I went to the 90th Precinct to file my report. As I was leaving the Precinct house, I encountered the police detective ‘DTS Bruno Vidal’, who advised me about acquiring information about the moving company to pursue my case. DTS Vidal also provided me with his card.

b). On August 27, 2008, on a subsequent visit to the 90th Precinct, I encountered ‘DTS Vidal’ once more, who again offered to help me. ‘DTS Vidal’ called me on my cell phone later that day to ask if he could come to my home to conduct an investigation. I believed that ‘DTS Vidal’ was conducting official business and agreed. ‘DTS Vidal’ arrived at my home in the early morning hours of August 28, 2008. DTS Vidal began to act amorously towards Yi Sun. At one point, DTS Vidal embraced Yi Sun and inserted his tongue into my mouth. I told DTS Vidal that his behavior was unacceptable and asked him to leave. But ‘DTS Vidal’ left the premise. I was thrown roughly to the ground, and DTS Vidal bathed in high feeling, flushed and menacing, with doubled fist. He raped me at my apartment (located at ‘1060 64th Street, Apt 2R, Brooklyn, NY 11219’).

Then DTS Vidal used the lavatory. After he returned back, he hung me and second time raped me at the apartment in the same day on August 28, 2008, in the early morning. I couldn’t hold back my tears. DTS Vidal wrote an apology note to me. Then he went away. Later on, DTS Vidal called me to apologize, while still continuing to express amorous intentions in his contacts as well as other “disgusting words”. I also found an unused condom in my apartment, which I believe was dropped by DTS Bruno Vidal.

c). DTS Vidal continued to correspond with me up to September 4, 2008. During the time, I tried to contact with a female police officer in Chinatown, I wanted to ask for her help, but they stared at me in complete disbelief. On that day I went to the 90th Precinct to report DTS Vidal’s sexual misconduct (include **Sexual assault** and **sexual abuse** etc) to his supervisors, where I was told to contact IAB of NYPD (New York City Police Department

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Internal Affairs Bureau). Later that day, I was interview by IAB in Brooklyn. Later that night, between ten to twenty police officers arrived at my residence to take DNA and photos of the scene and conduct an investigation. I was interviewed again by IAB on September 13, 2008, where I expressed a desire for the situation to be investigated.

d). IAB Sergeant Thomas Spitzfaden, contacted Yi Sun, asking me to sign a form to withdraw my IAB complain. Sgt. Spitzfaden informed me that he believed DTS Bruno Vidal and Yi Sun are/were friend and what transpired between them is their business. But I denied that I and Det. Bruno Vidal were friends because I had met the detective at the 90th Precinct and I believed that DTS Vidal was acting on official police business.

Then, IAB Sergeant 'Zichao Chen' also contacted Yi Sun, speak in Mandarin, to as me to withdraw my complaint. I refused to sign, wishing to protect my rights and intends to seek legal counsel. I believe that I was being pressured to withdraw my complaint because police officers "cover for each other."

e). After I got a sexual assault by the third police detective DTS Bruno Vidal in the early morning hours of August 28, 2008, I became pregnant with his child and aborted it on or about October 13, 2008. I had to go to the Emergency room of 'Maimonides Medical Centre'. The NYPD Internal Affairs Bureau (IAB Sgt. Thomas Spitzfaden and Sgt. Zichao Chen et al) contacted me asking me to sign a form to withdraw my IAB complaint. And they bade me hold my peace, they threatened me. They told me about "If I filed a complaint against the police detective and refused to obey to them, I may no longer able to see my 9-years old daughter Michelle, and will lost custody of the child."

At the time, nobody help me in difficult situation. My heart was so sad and I was in so much pain that I had to cry. I don't want police officers coming to my home and disrupting my life. Also I was embarrassed by the attention I was getting from my female neighbors. I feel I was getting a bad reputation and I believe that IAB is biased in their investigation.

f). During the time of IAB investigation, I was harassed and intimidated by the NYPD Internal Affairs Bureau. On September 26, 2008, I filed a complaint to the CCRB (NYC Civilian Complaint Review Board) about Det. Vidal and the NYPD IAB's misconduct (CCRB Case No: **200814014**).

I have complained of official harassment and intimidation after the rape victim refused to withdraw the last complaint against the NYPD detective's sexual misconduct. .

But after a time, the investigation into the 'sexual aggression of NYPD detective' has gone nowhere after the 'CCRB complaint' removed to the NYPD 'Chief Department'.

g). On July 13, 2018, I went to CCRB to ask for a copy of records in my all complaints in past. However, after 40 days, I received a mailing with 7 pages and 1 DVD from "Records Access Officer" of CCRB on August 22, 2018, but these papers' many more important information were either left blank or hidden by someone. The copy and the DVD picture are not very sharp. Beside, at the complaint about Det. Bruno Vidal, I find that CCRB never write my statement about I got twice sexual assault by Det. Vidal in the "same night on 8/27/2008, and CCRB never write the important fact that I became pregnant with Det. Bruno Vidal's child etc in the complaint report.)

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Current I do not find my CCRB complaints in the records of ‘**New York Civil Rights Law § 50-a**’. I believe that the power(s) of NYPD (include the NYPD Commission, Chief department et al) always use his/her power of position to deny/dismiss/close the CCRB complaint(s) under ‘dismiss with prejudice’ and the ‘investigations proceedings’ had been rigged again.

V. Sadly, because the NYPD’s bias for the three uniformed detectives’ sexual violence and depreciating it was violent, the helpless rape victim’s msery opened up a Pandor’s box of ‘repeated sexual assault’

It is common for police officers or and the legal profession to shield each other from punishment, but the phenomenon reaches an extreme in the City of New York especially the ‘New York City Police Department’ and the judicial system in Manhattan County. After the three matters, the Plaintiff (a helpless rape victim)’s msery opened up a Pandor’s box of ‘repeated sexual assault’-----

21. FACTS ⁴:

4) The fourth “policeman” Sam Tsang, who came to to Plaintiff’s home from 61th Precinct and raped her on 11/30/2008 and 12/27/2008-----
Plaintiff Yi Sun’s testimony with full of her blood and tears:

a). “Sam Tsang” was/is the assistance of Commanding Officer in 61 Precinct (in Brooklyn). Stated on November of 2008, ‘Sam Tsang’ initiatively contact with me after he listened to my cases “about the single Chinese woman got the last sexual assault by the detective from 90th Precinct”. At the time, he once picked me up and drove me to see some New York City Councilman/councilmen in Brooklyn. “Sam” told me that he is a good person and he would try the best to help me. I believed the Chinese policeman (who was/is the assistance of Commanding Officer in the 61 Precinct), so I greed him came to my apartment to talk about the current ‘housing case’ and ACS case.

Explain: Since IAB officers first time came to my apartment on September 4, 2008, between ten to twenty police officers arrived at my residence to take DNA and photos of the scene and conduct an investigation at the dead of night, my landlord asked me to move to another place from the apartment (located at “1060 64th Street, Apt 2R, Brooklyn, NY11219).

b). “Sam Tsang” called me and said that he will pick me up and drive me to the Councilman’s office. On or about November 30, 2008 or and December 27, 2008, I got a sexual assault by the fourth man “Sam Tsang” after he entered the apartment. At my living room, he shoved me to the ground, then he at once resumed his true shape and ravished the woman (Plaintiff), so that she was shamed into obey him. Later, I had to contact with his wife, and told her about this matter. But I got the hurling insults and treats by “Sam Tsang” and his family. Later, I was bullied, insulted, harassed and ‘threatened with death’ by them.

c). At night on March 2, 2009, after I was insulted, harassed and intimidated by the man. I tried to contact with the Chinese female Police ‘Det. Suk H. Too’ and asked her to help me to report my request to Police Department. Later, some police from IAB came

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to my place to take the toilet paper with Sam Tsang's semen, but later the officers of NYPD Internal Affairs (in Brooklyn) bade me hold my peace, they threatened me again.

After that, I was full of righteous indignation. .

22. FACTS ⁵:

5) Plaintiff Yi Sun's testimony with full of her blood and tears:

In the same time, I once got sexual assault and sexual abuse by the fifth policeman, who was/is the detective or supervisor in 72nd Precinct. I believed the African American detective is the supervisor in the 72nd Detective Squad. He knew Det. Bryan Trockel's matter in past; and he knew me and related matter. He told me that he once came to investigate the ACS complaint and others for few times. Stated on or about September of 2008, he tried to call me after he listened to my current matter about "I got a sexual assault by the detective from 90th Precinct".

But that time I refused to report to police again. Because the detective once said that he will scare me out of telling the police. He said: "I knew you were orphan in China. You only have a little daughter in ACS. Someone will kill you if you talk this to Police. No one knows I am here anyway, so don't worry." His frigid glance made me afraid. I fear policemen's violent and sexual abuse more than anything.

23. FACTS ⁶:

6) Plaintiff Yi Sun's testimony with full of her blood and tears:

On August 5, 2013, I got a sexual assault by the sixth policeman Lt. Timothy Cai, who was/is the lieutenant in 108th Precinct.

a). On or about January of 2013, I wanted to move to Manhattan from my former apartment in Elmhurst of Queens, so that my 13 years old daughter Michelle can better go to the Arts High School in Manhattan. On or about February 18, 2013, I first time came to the Extra Space Storage (located at 36-02 Northern Blvd, Long Island City, NY 11101), I face to face talked with the assistant manager Mr. Ed Rivera about I need a room to place my stuffs for some months. Then I gave the check \$365 to the storage on February 27, 2013. Mr. Rivera agree that Yi Sun can take her stuffs to move in the unit #1xxx/size 10x15 at the storage's First Floor on February 28, 2013.

But on February 28, 2013 at afternoon, when the moving company driving the truck with Yi Sun's stuffs to come to the Extra Space Storage, Mr. Jose Ramirez, another assistant manager told Yi Sun that "No 10x15 size at this time". Later, I had to agree to save my stuffs in the Unit #4107/size 10x10 at the storage's 4th Floor on the same day.

b) On or about June 27, 2013, at 1:30PM, I came to the storage and would pay the July rent for the Unit#4107. But the storage manager still refuses my check or cash, and he more times and again obstructing me to enter the Space Number: Unit#4107. At 2:43PM on same afternoon, I had to call NYC 311 to request for the help after I was waiting for one hour. Later, NYC 311 helped me to contact with the local police station to come to the place.

About 3:30PM, two female police officers came to the Extra Space Storage, but the storage manager Mr. James Goings was always bad-mouthing the customer Yi Sun to the cops, and he made continual lies to them about Yi Sun didn't pay the Monthly Rental Charge in the past months. During the times, Mr. James Goings often spoke to the female

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police officers with exaggerated story, and Yi Sun became a laughing stock in the public. For these reasons, the two female cops didn't believe what Yi Sun have said, be that as it may. So, the cops agree the storage manager's action, they refused Yi Sun to enter the Unit#4107 in the time, and told me to leave immediately from the Extra Space Storage.

c) Later, I had to contact with NYC 311 again after I was waiting for few hours. 311 suggest me to go to the local 108th Precinct. On June 27, 2013, I first time went to the 108th Precinct stationhouse (in Long Island City) to report a monetary dispute at this Queens storage facility and to complaint that I was handcuffed by two female officers. I interacted with Lieutenant Timothy Cai in the 108th Precinct stationhouse, who provided me with CCRB forms and CCRB phone number. After the date, subsequently, Lieutenant Cai contacted me several times and requested to meet in person.

On August 5, 2013, I accepted Lieutenant Cai's invitation to meet with him in Manhattan. We met in Chinatown near the 'Grand Street playground'. Lt. Cai and I conversed inside of his personal grey car. I trusted Lieutenant Cai, so when he removed his clothes and exposed his genitals, I objected his action and wanted to leave. But Lt. Cai left the premise, and he forced me to go along with the "sexual relations". After I got off, Lieutenant Cai continued to contact me by phone, requesting to meet. I wanted to end the "relationship" because I was emotionally uncomfortable. Later, I agreed to talk with him one time on September.

d) On or about September 15, 2013, Sunday, we met in City Hall near the Park. Lt. Cai and I conversed inside of his personal grey car. Lt. Cai again removed his clothes and exposed his genitals, I was forced to perform oral sex on him after he pushed down my head. I was nauseous and vomiting. I couldn't hold back my tears when I watched on all this. I believed that it's Unspeakable sexual abuse.

Lieutenant Cai continued to correspond by text and phone calls. I informed him that I was going to complaint about his actions if he refused to make a sincere apology to me. I strongly urge a sincere apology to the sad woman. Otherwise I will go to contact his boss in Police Department.

e) After I was forced to perform oral sex on Lt. Cai on September 15, 2013, I was sick and had a Nervous Vomiting every day for some months. On September 24, 2013, I called 311 to make a complaint report about the sexual abuse matter.

After I had contacted IAB in regards, I met with three female officers from IAB, whom she identified by name and rank as Det. "Matanas", Sgt. Pan and Sgt. Schwogel, near Queens Plaza and 29-76 Northern Boulevard to discuss the incident and view a phone array. I primarily interacted with the officers in English, and occasionally in Chinese with Sgt. Pan.

The three IAB officers (Sgt. Marni Schwager, Sgt. Jessie Pan and Sgt. Stephanie Artinez) tried the best to justify Lieutenant Timothy Cai, they asked me to sign a form to withdraw my IAB complaint. I don't agree to sign the Form. But the three female IAB officers said that "We still can dismiss your complaint if you do not sign the Form."

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f) On October 7, 2013, I filed a complaint against their misconduct to CCRB (NYC Civilian Complaint Review Board). I have complained of NYPD's harassment and intimidation, and I got unfair and abuse in thses complaint. (CCRB Case No: **201309355**).

Later, I knew that the IAB top officer 'Deputy Inspector Ge' and Hugh H. Mo tried to help their friend 'Lt. Timothy Cai', and moved his work place to 72nd Precinct in Brooklyn from 108th Precinct in Long Island City.

g). Current I do not find the CCRB complaint against 'Lt. Timothy Cai' in any report. I do not find my CCRB complaints in the records of '**New York Civil Rights Law § 50-a**'. I believe that the top NYPD officers (include the NYPD Commission, Chief department et al) always use his/her/their power of position to deny/dismiss/close the CCRB complaint(s) under 'dismiss with prejudice' and the 'investigations proceedings' had been rigged.

24. FACTS ⁷:

7) Plaintiff Yi Sun's testimony with full of her blood and tears:

After the NYPD's bias for the three uniformed detectives' sexual violence and depreciating it was violent, the helpless rape victim's msery opened up a Pandor's box of 'repeated sexual assault'.

On July 26, 2011, I got a sexual assault by the boss Scott Richman in the Manhattan design company "Threadtex Inc", (located at 641 Lexington Avenue, 6th Floor, New York, NY10022) on July 26, 2011. I believed that the boss knew my matters about I once got a series of sexual abuse by these policemen. This is the main reason.
(More information is also available on the old case, filed by Yi Sun on 11/08/2018, Original District Court Docket: **USDC NYSD 2018 CV11002; Yi Sun v. 'Scott Richman & Threadtex Inc'**

Current I still don't know the new address of Defendant 'Scott Richman & Threadtex Inc'.

25. FACTS ⁸:

8) Plaintiff Yi Sun's testimony with full of her blood and tears:

After these matters, the helpless rape victim's msery opened up a Pandor's box of 'repeated sexual assault'. I once got sexual assault by the WCB doctor Tsai Chung Chao in past. As far as I knew, during the period of January 13, 2008 through on or about August 20, 2009, the medical specialist Dr. Tsai Chung Chao M.D. more times injected his female patient with what is believed to be a narcotic and sexually assaulted the victim, beside, the bad doctor forced the victim to engage in sexual activity in exchange for medication and medical treatment, while at his clinics, office, apartment, or and the victim's apartment.

(More information is also available on the old Court cases and OPMC Complaint: New York County Supeme Court: Index No: 108013/2010; filed on 06/17/2010; Original District Court Docket: **USDC NYSD 2019 CV00017**; And USDC NYSD 2019 CV10858.)

Explain: Before the 'a one-year window' of '**Adult Survivors Act**' (S.66A/a.648A), These cases was closed/deny/dismissed at the 'New York County Supreme Court' on April 25, 2018 and the 'United States District Court, Southern District of New York' 'between on January of 2019 and 2021". The incompetent judges always use his/her power of position to

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deny/close the cases under 'dismiss with prejudice' and the judicial process had been rigged. They all are the good friends or and colleagues/partners to Hugh H. Mo, Esq. As far as I knew, in Mr. Mo clients' any cases, these Judges always became a part by actively ruling for criminal Defendants, and tried to screen his/her guilty friend's heinous crime). The incompetent judges include: Judge Carmen Victoria St-George and her husband 'Norman St. George', who current as 'First Deputy Chief Administrative Judge' in New York State; Judge Andrew L. Carter Jr. and Judge Laura Taylor Swain, who current is the chief Judge of 'New York Southern District Court'; Judge Denny Chin (and his wife Kathy Hirata Chin), a Judges of 'Court of Appeals for the Second Circuit';

a). I had a neck and back injuries in my work place on June 28, 2008. The medical specialist Dr. Tsai Chung Chao M.D was the WCB doctor. I got sexually assaulted (after an injection by the bad doctor) in his clinics.

As far as I knew, during the period of January 13, 2008 through on or about August 20, 2009, the medical specialist Dr. Tsai Chung Chao M.D. more times injected his female patient with what is believed to be a narcotic and sexually assaulted the victim, beside, the bad doctor forced the victim to engage in sexual activity in exchange for medication and medical treatment, while at his clinics, office, apartment, or and the victim's apartment.

b). After I found the unidentified spots (semen) in my body (by Dr. Chao's injection), I believed that the medical specialist (Dr. Tsai Chung Chao M.D) injected his female patient with what is believed to be a narcotic and sexually assaulted the victim in past. I reported to police about the bad doctor's misconduct and criminal offense; and I send a complaint to "New York State Department of Health, Office of Professional Medical Conduct" (OPMC NY-09-10-6712A) on October 13, 2009.

On June 17, 2010, I filed a law suit against Dr. Tsai Chung Chao, M.D about his sexual assault and medical malpractice. Between on 06/17/2010 and 4/25/2018, Dr. Tsai Chung Chao's attorneys 'Hugh H. Mo, Esq' used a series of tricks to stop or dismiss the trial jury in the case. (Index No: 108013/2010).

(**Explain:** Mr. Hugh H. Mo, Esq is a former Deputy Commissioner of New York Police Department, and a former District Attorney of New York county; beside, Mr. Mo is an arbiter of "New York Commission on Judicial Conduct" and a member of "Police Training Advisory Board" of NYPD.)

c). On March 29, 2018, the case moved to the Part 34 (located at 80 Centre Street, Room 308,) by the Judge Ms. Carmen Victoria St-George, who is the Defendant's personal attorney Mr. Hugh H. Mo, Esq's former colleague and good friend; her husband 'Norman St. George', too.

Explain: Mr. Norman St. George was appointed as First Deputy Chief Administrative Judge, the second-highest ranking administration position within the New York State Judiciary, effective May 19, 2023. The appointment was made by Chief Administrative Judge Joseph A. Zayas, with the consultation and approval of Chief Judge Rowan D. Wilson and in consultation with the Presiding Justices of the Appellate Divisions. In this capacity and on behalf of the Chief Administrative Judge, Judge St. George oversees all trial-level courts throughout the State, as well as all departments and operations within the Office of Court Administration. He also directly supervises the courts in the Tenth Judicial District, Nassau and Suffolk Counties. Immediately prior to his current position, Judge St. George served as the Deputy Chief Administrative Judge for Courts Outside of New York City. Judge St. George is an elected Justice of the Supreme Court for the 10th Judicial Department. Judge St. George served as the

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District Administrative Judge for all courts in Nassau County from 2019 through August of 2021. In that capacity, Judge St. George oversaw the Supreme Court, County Court, Family Court, Surrogate Court, District Court, and all City and Village Courts. From 2013 through 2018, Judge St. George served as the Supervising Judge of the Nassau County District Court.

d). The judge (Carmen Victoria St-George) refused to evade this case for “challenge for cause” after my request. From April 2, 2018, through April 23, 2018, during the 12 days of Jury Trial, the trial judge full supports the Defendant’s attorneys’ new motion and object the Plaintiff show the most important material evidence (the DNA evidence about the Defendant Dr. Chao; the translated and notarized diary about the Defendant Dr. Chao; the Translated and notarized sex tapes about the Defendant Dr. Chao; the OPMC matter about the Defendant Dr. Chao etc) to the Court for Jury. Later, the verdict of the jury was given in the Defendant (Dr. Tsai Chung Chao)’s favour.

During the all times of jury trial, the trial judge (Carmen Victoria St-George) and the party attorneys joint fraud in the case. They always used her/his position of power to do “Under-the-table” in the jury trial and objected Plaintiff’s a series of the most important material evidence for the jury; especially, from the outset, by the fraud of “conspiracy to perform official misconduct”, the “Jury Trial” has been tainted by a conspiracy characterized by destruction of evidence, distortion of truth and witness intimidation.

(1), the judge (Ms. Carmen Victoria St-George) erred in denying the admission of critical pieces of evidence of the Plaintiff –the taped conversations and love making; use of diary etc;

(2), the judge erred in striking the testimony of Dr. Andrew Chan, M.D, the Psychiatrist;

(3), the judge erred in admitting SUNY sign in sheet, and NATURO sign in sheets which were not previously provided to Plaintiff but shown the first time when sought to be admitted but justified; further more. SUNY records did not come from the keeper, and NATURO record’s originals were destroyed by Defendant two years after suit was filed and not all relevant copies were kept;

(4), the trial judge erred-in allowing Defendants to Cross-examine Defendant-asking leading questions;

(5), The trial judge became a part by actively ruling for Defendants (Dr. Tsai Chung Chao or and his personal attorneys Mr. Hugh H. Mo, Esq and Mr. Michael A. Sonkin), making objections on their behalf, and showing clear objection to Plaintiff and Plaintiff’s case that the Jury must been tainted by her actions-

(6), Allowed Defendant to Cross-examine Plaintiff with all unfavorable information no matter how irrelevant or designed to incense the Jury because “her credibility” is in issue why protecting Defendant from anything that might soil his credibility;

f). On August 21 of 2018, the Plaintiff returned to the Clerk office Room B141 and request for a copy of transcripts of Jury Trial. But the Court clerk told her that the court (New York Supreme Court) have not the court transcripts of Jury Trial in here. They told the Plaintiff to ask the information from the trial judge at Part 34. Later, the Plaintiff knew that the Part 34 don’t provide the clerk to do the court transcripts in the Jury Trial on the case. The Plaintiff believed that it’s the most serious judicial fraud in the jury trial by the Supreme Court trial judge (Carmen Victoria St-George) on the concluded case.

Between April 5, 2018 and December 5, 2018, the Plaintiff once many times made motion(s) to request for a new trial in the Court. But my request letters (with Motions) to the local higher headquarters would disappear or be ignored. The appeal is focused more on the one sided rulings and admissions that only favored defendants. On January of

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2020, the ‘Appellate Division-First Judicial Department’ refused to take my Appeal Brief on the plea of a “during the time of covid-19”.

During the period of August 27, 2009 through on or about March of 2015, Hugh H. Mo, Esq again abetted his criminal client to report false cases to and sued me (sexual assault survivor; litigant) to ACS (NYC Administration for Children’s Services) or and NYPD (New York City Police Department, 109th Precinct, 13th Precinct, 5th Precinct, 1st Precinct and ‘NYS University Police’ etc) over 30 times. As a result of the false reports made by Dr. Tsai Chung Chao or and his personal attorneys Hugh H. Mo, I was taken into custody and detained without cause at the 13th Precinct twice on or about August 26, 2009 and June 12, 2010, at the same time, my daughter (Michelle Sun) was taken away from my care for ACS----

g). I feared to touch on distressing memories. During the time of these cases, Hugh H. Mo, Esq abetted his clients has reported false cases to and sued me (about “Child Neglect of Abuse or Maltreatment”) to New York City Police Department (NYPD) and NYC Administration for Children’s Services (ACS) or and “New York State Office of Children and Family Services, the New York State Child Abuse and Maltreatment Register” total over 60 times. During the times of ACS cases, between on December of 2003 and on September of 2013, I got sexual assault by six bad NYPD policemen, who raped me and extorted sex and money from me in order for me to stay out of jail and keep my child (Michelle Sun) when Hugh H. Mo abetted his clients (Li Da Sun and Tsai Chung Chao, M.D.) reported false cases to and sued me to ACS and NYPD for more times. Later, Hugh H. Mo and his privileged friends (include the Judges in New York) made a series of serious Judicial Fraud (e. g “Conspiracy to obstruct Justice, Scheme to Defraud, Hindering prosecution, Conspiracy to obstruct justice, Conspiracy to perform official misconduct” et al) in the Court(s) in New York.

Mr. Hugh H. Mo is a former Deputy Commissioner of New York Police Department, a former District Attorney of New York county; and current he still is an Arbiter of “New York State Commission on Judicial Conduct”, and a member of “Police Training Advisory Board” of New York City Police Department; beside, he is the founder of the “NYPD Asian-American Police Executives Council” (AAPEX). However, in fact, Hugh H. Mo is a long-term special legal adviser for “Consulate General of the People’s Republic of China in New York”. He always became the Defendant attorney for rich Chinese felon against the Federal government of the United States, but later, he always sued his client to ask for the payment of a huge attorney fees. He has many friends from the ‘Judiciary of New York’ (New York State Unified Court System). Bribery and corruption were rife in the industry. For many years, the Judge(s) always became the attorney and is/are the silent partner(s) in all cases of Hugh H. Mo or and ‘The Law Firm of Hugh H. Mo, P.C.’

h). Bribery and corruption are said to be a major problem in New York unified court system. The Law has become “plasticine” in the hands of law-breakers. I was shocked to see the worst conspiracy of judicial fraud in my cases at the Courts in New York by these Judges (E.g. 1. Judge Carmen Victoria St-George, her husband ‘Norman St. George’ current

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as 'First Deputy Chief Administrative Judge', and on behalf of the Chief Administrative Judge, Judge St. George oversees all trial-level courts throughout the State, as well as all departments and operations within the Office of Court Administration.

E.g. 2. In the 'New York Southern District Court', Judge Mr. Andrew L. Carter Jr.; and the new chief Judge Ms. Laura Taylor Swain, and Ms. Sarah Netburn, etc;

E.g. 3. Judge Mr. Denny Chin, a Judges of 'Court of Appeals for the Second Circuit'; his wife Kathy Hirata Chin is a partner in Crowell & Moring's New York office.----

They all are the good friends or and colleagues/partners to Hugh H. Mo. As far as I knew, in Mr. Mo' clients' any cases, these Judges always became a part by actively ruling for Defendants, and tried to screen his/her guilty friend's heinous crime. Beside, these incompetent judges use his/her/their power of position to deny/close the case(s) under 'dismiss with prejudice' and the Judicial process had been rigged.

26. FACTS ⁹:

9) Plaintiff Yi Sun's testimony with full of her blood and tears:

Beside, I once got sexual assault by the doctor assistant 'Liang' in Elmhurst Hospital Center (Room HD2-8, Surgery Office) on or about June 1, 2009, Tuesday. 'Liang' was the assistant for 'Dr. Unsup Kim, M.D'. The man told me to check my abdomen for 'Pancreatitis', but he used his fingers to touch my private parts (include the inner lips and clitoris), and put his fingers into the 'vaginal opening'. I told him to stop the action, then I report to the few staffs in the Hospital. Later, I once filed a complaint to OPMC on the summer of 2009.

INJURIES

('A Sorrow Worse Than Death' under a long-term 'rape trauma syndrome' etc)

27. At the time, tears streamed down my checks as Yi Sun recounted my unhappy experience again. I have problems controlling my sad and anger. Nobody understand that the rape survivor Yi Sun's difficult situation under a fearful life (after the victim of repeated sexual assault was beaten and tortured in mind by these rapists). I was a holy woman, innocent and chaste, but after I was got sexual assault and sexual abuse by these bad men (include the six NYPD policemen, and Hugh H. Mo's clients: Li Da Sun and 'Tsai Chung Chao, M.D' et al). The scandal distressed me under a long-term 'rape trauma syndrome'.

For the last oven ten years, the psychic scar grew into a castle in my wounded heart. Those psychic scars would never heal.

Nothing could ever undo the wrong, hurt or cure the pain that these Defendants had inflict on me. These injuries sustained by survivor include:

- 1) rape/Sexual assault;
- 2) Sexual abuse;
- 3) Sexual exploitation;
- 4) Sexual molestation;
- 5) Unspeakable abuse;
- 6) Emotional distress and stress;
- 7) Sleeplessness;
- 8) Depression;
- 9) Anxiety;

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- 10) Broken heart syndrome & Excessive sad;
- 11) Post Traumatic Stress Disorder;
- 12) Loss of enjoyment of life;
- 13) Severe pain and suffering, etc;

Since Yi Sun got sexual assault multiple times in the past, I am under a great pressure in life. I feel sad and down nearly all of the time. My future seems hopeless. I am currently still suffering from difficulty in sleep, having flash-backs and intense psychological distress at exposure to male figures what resemble me perpetrators from the past. These symptoms are consistent with Post Traumatic Stress Disorders (PTSD) and let me sad and I feel that my day-in and day-out misery comes from these bad men and I feel the loss of enjoyment of life. I feared to touch on distressing memories.

This is 'a sorrow worse than death' under a long-term 'rape trauma syndrome'. These bad persons' sexual violence had made Yi Sun's life a living hell.

PRAYER FOR RELIEF

28. WHEREFOR: Yi Sun respectfully requests that Court:

- i Order Defendant 'Tsai Chung Chao' to retract his defamatory statement in network; Order NYPD and CCRB provide all original complaint records about Yi Sun in past;
- ii Award Yi Sun compensatory damages in an amount to be determined at trial;
- iii Award Yi Sun punitive and exemplary damages in an amount to be determined at trial; and
- iv Award Yi Sun 'TEMPORARY PROTECTIVE ORDER' against Defendants' harassment and intimidation etc, and such other and further relief as this Court may deem just and power.

29. Petitioner's 'Motion for Summary Judgment' before the Jury

In the United States federal courts, summary judgment is governed by Federal Rule 56 of the Federal Rules of Civil Procedure, derived primarily from the three seminal cases concerning summary judgment out of the 1980s. See Federal Rules of Civil Procedure 56; *Celotex Corp. v. Catrett*, 477 U.S. 317, 322–27 (1986) (clarifying the shifting allocations of burdens of production, persuasion, and proof at summary judgment); *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 257 (1986) (applying heightened evidentiary standard of proof in libel action to judicial assessment of propriety of summary judgment); *Matsushita Elec. Industrial Co. v. Zenith Radio Corp.*, 475 U.S. 574, 596–98 (1986) (holding antitrust plaintiff with an inherently implausible claim was subject to dismissal at summary judgment).

Rape (sexual assault) is a serious crime/felony. It is gross violations of human rights. Our Court mustn't wrong innocent people and palliative enemies.

In the original case at the "New York Supreme Court" (Index No: 108013/2010) for eight years, these Direct evidences were already confirmed court evidences by 'Hon. Judge Joan. B Lobis' at 'Part 6, New York Supreme Court' on or about March 20, 2012. These a series of the most important material evidence include:

- 1) The DNA evidence about the Defendant;

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- 2) The translated and notarized diary about the Defendant;
- 3) The translated and notarized sex tapes about the Defendant;
- 4) The unused vials and the broken cell phone,
- 5) the medical reports by SLR Crime Victims Treatment Center,
- 6) the medical reports by the Psychiatrist Andrew Chan; and
- 7) a series of proofs of document,

All these direct evidences and Material Facts full support to the Court for 'Motion for Summary Judgment' by the Highest Federal Court.

30. Petitioner's 'Motion In limine'

Law was an order of peace founded on fairness. The first of all laws is to respect the laws. "28 U. S. C. Section 372(c)" or and "Judicial Disciplinary Procedure in the U. S. and Its 50 States" is a series of rule, law procedure and behavior's moral ethic norms established by the writers/founders of Constitutional commission. Judges cannot permit irregularity in carrying out justice. Include: Do not abuse the power and abuse the law in the making judgment; Do not exploit the power and status of a judge to seek improper gain; Do not freely make comments that is damaging to the solemnity and authority of judgments that has come into force. From the items of the law, these legal provisions and Rules to show how careful the framers were to prevent usurpation of power by any one branch of government.

The Court shall/should be ruled in a clear and precise way a simple principle. This principle is equality before law. Every party shall/should be have a 'Due process' (with "procedural due process" and "Substantive due process") and 'An unbiased tribunal'; Insult, libel, false charge or frame -up directed against legal persons by any means is prohibited.

Hugh H. Mo is a former Deputy Commissioner of New York Police Department, a former District Attorney of New York county; and current he still is an Arbiter of "New York State Commission on Judicial Conduct", and a member of "Police Training Advisory Board" of New York City Police Department; beside, he is the founder of the "NYPD Asian-American Police Executives Council" (AAPEX). Hugh H. Mo has many friends as Judge(s) in the State Court and the Federal Court, include:

(E.g. 1. Judge Carmen Victoria St-George, her husband 'Norman St. George' current as 'First Deputy Chief Administrative Judge', and on behalf of the Chief Administrative Judge, Judge St. George oversees all trial-level courts throughout the State, as well as all departments and operations within the Office of Court Administration.

E.g. 2. In the 'New York Southern District Court', Judge Mr. Andrew L. Carter Jr.; and the new chief Judge Ms. Laura Taylor Swain, and Ms. Sarah Netburn, etc;

E.g. 3. Judge Mr. Denny Chin, a Judges of 'Court of Appeals for the Second Circuit'; his wife Kathy Hirata Chin is a partner in Crowell & Moring's New York office.----

So, Plaintiff file 'Motion in limine' is request for fair and justice, and such other and futher relief as this Court may deem just and power.

31. PROPOSED QUESTIONS FOR REVIEW

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Now the helpless Petitioner-litigant *Pro Se* respectfully request for **Judicial Review** for 'error (artificial mistakes) in **Law and Procedural Process** (at the Courts in Manhattan County) by the **Highest Judiciary** and **PROPOSED QUESTIONS FOR REVIEW**:

1). Whether the sexual violence (rape) is tolerated under the Federal Law of the United States?

2). Whether these privileged rapists should be had legal immunity, No wrongdoer on these policemen (and the friend/clients for the former NYPD Deputy Commissioner/District Attorney of New York County) would be granted immunity from prosecution? Whether the NYPD cops and the Arbiter and the Judges' friends should be enjoy special privileges, No wrongdoer on these privileged Defendants would be granted immunity from prosecution in the United States?

3). Whether Rape (sexual assault) is a serious crime/felony and gross violations of human rights by the law of "Offences against the person (Amendment) Act 1992"? Whether the sexual violence is tolerated under "Universal Declaration of Human Rights" or and "Covenants on Human rights"?

4). Whether current federal hate crime law is still tolerated under the Federal Law in the United States? Whether 'the cultural bias of Hate crime' of the Judge(s) resulted in a subjective interpretation or and "racial discrimination" of the conflict of interest that permitted an erroneous finding and adjudication of "Dismissed the all claims" with every Motion, and forced the Asian woman to peacefully submit to all sorts of indignities (include personal insult and deliberate humiliation)?

5). Whether the "crime of bending the law for self-seeding" is tolerated under the Federal Law of the United States, and whoever intentionally goes against facts and laws in civil and administrative trials to render judgments that misuse the law?

6) Whether the Judges /Courts (in Manhattan) should be has two kinds of eye however to this Asian litigant *Pro Se* Yi Sun (disadvantaged ethnic minority) and other all Attorneys two kinds of measure, this Asian Petitioner Yi Sun resembles "the child of stepmother" often undergo unfair treatment?

7) Whether the 'Adult Survivors Act' (S.66A/a.648A) creating a one-year look back window for survivors of sexual assault that occurred when they were over the age of 18 to sue their abuses regardless of when the abuse occurred, but preclusion of the Asian survivor Yi Sun (who was the rape victim of repeated sexual assault by the six NYPD cops and the medical specialist Tsai Chung Chao M.D. in the City of New York), the main reason is these privileged rapists or and their attorney all are the friends to the Judge Carmen Victoria St-George and her husband 'Norman St. George', who current as 'First Deputy Chief Administrative Judge' in New York State?

32. PETITION For 'JUDICIAL REVIEW' in the old cases,
Pursuant to "28 U. S. C. Section 372(c)" or and "Judicial Disciplinary Procedure in the U. S. and Its 50 States"; and the Judicial Conduct and Disability Act of 1980 ("Act"), 28 U.S.C. §§ 351–364.

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Original District Court Docket: **USDC NYSD 2018 CV11002**
Court of Appeals Docket: USCA2 Nos. 19-1087(L), 19-2459 (Con)
And the Related Cases: USDC NYSD 2019 CV00017
USDC NYSD 2019 CV10858
RE: Yi Sun v. NYPD and Hugh H. Mo. et al

1) It's the Judges' job to sort out grievances. Regrettably, racism prejudice and collusion continued to manifest itself in many forms in the Courts in New York. However, in my cases (at the Federal courts and State Courts in New York) for many years, I was horrified and sickened after I saw the worst conspiracy of judicial fraud (collusion) by the privileged Defendants and their attorneys/friends. Conversely, the innocent rape victim of repeated sexual assault was bullied, insulted, harassed and 'threatened with death' by the real criminals and their Judge friends. From the outset, by the fraud of "conspiracy to perform official misconduct", the all actions have been tainted by a conspiracy characterized by destruction of evidence, distortion of truth and witness intimidation. From beginning to end, I never timely receive any reply include the copy of document, mailing, phone calling et al from any Defendants, Beside, many times, I did not timely receive a copy of Order from the Clerk Office of the Courts, and my documents often missing and lost by someone after I filed to the federal courts.

2) I am the Petitioner (or and Plaintiff/Appellant *Pro Se*) in these cases, and I am fully familiar with the facts and circumstances of the subject action. Between on June 17, 2010 and April 30, 2021 (hand injury date) and current, I continuously filed/sent a series of Petitions/Motions with Documents to the Courts (include the State Courts and the Federal Court), but these documents to the Courts would disappear or be ignored. Beside, the Petitioner submits that the "trial" was unfair and biased.

These "Material Statement & Material Facts of judicial misconduct" may include the following:

- (1). Treating the litigant in a demonstrably egregious and hostile manner under a strong prejudice, especially the Judge saw/see the Petitioner-Litigant *Pro Se* continuously filed the complaint against collusion;
- (2). Retaliating against the complainant/litigant who has lodged an appeal with the Court of Appeals et al; Deprived of private rights against the complainant/litigant;
- (3). Violating other specific, mandatory standards of judicial conduct, the Judge use any trick in the book to stop the litigant in the lawsuit even in Appeal.
- (4). 'Denial of Justice' and 'willful obstruction of law enforcement': the Judge(s) knowingly put the helpless special victim on a worst position and tried the best to justify these privileged Defendants (especially these serial cops rapist); And the Judge(s) tried/try to exempt acquaintances from penalties with her/their authority in the grave sexual violence;
- (5) The litigant (rape victim) was treated with great cruelty by the prejudicial Judge(s), who is a friend with the Defendants or and the 'Attorney for Defendant'. The Judge(s) always denied and objected the litigant (rape victim)'s reasonable Motion under the Constitution. And the judge(s) always use his/her Judge power of position to closed the case(s) under 'dismiss with prejudice' and the Judicial process had been rigged.

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3). The judicial process in this country should be is and will remain fair and transparent. By the Fifth Amendment and Fourteenth Amendment, The Plaintiff/Petitioner has/have the right to present evidence and a decision based exclusively on the evidence presented; requirement that the tribunal prepare a record of the evidence. All persons should be treated with justice. In my case(s), the Chambers/Court always objected the litigant (rape victim) to show the retroactive material evidence, and the Judge always support and believe the privileged Defendant's one-sided story against the opponents.

I have reasonable doubts (and evidences) to felt that the Judge is one of the accomplice in the most serious judicial fraud after the bribery-pander by the first ringleader of Defendants, who is/was the one of Defendants and the Attorney(s) for the rich rapist. (Tsai Chung Chao, billionaire and his personal attorney Mr. Hugh H. Mo). I have reasonable doubts to believe that the Judge(s) used/uses her/his position for personal financial gain in the case(s);

- a) using the judge's office to obtain special treatment for friends or relatives;
- b). having improper discussions with parties or counsel for one side in a case;
- c). accepting bribes (include money, gifts, or other personal favors related to the judicial office).

Hence the fact that, in this collusion, nobody reined in the excesses of the transfer of benefits between the legal pettifogger (bad Attorney for these privileged felon) and the federal district court. But we are resolutely against "collusion between the privileged felon and/or and their attorney and the District Court top Judge and transfer of benefits."

The crime of bending the law for self-seeding is the judicial staff malfeasance of ceremony punishment commit a crime. As a senior United States District Judge, Their behavior was, in a word, shocking.

4) The Honorable John G. Roberts, Jr., Chief Justice and the Highest Judiciary have a duty to give you advice to your subordinate. It is your responsibility to put them (the Law-breakers) on the right track. And any senior Justice has a duty to condemn collusion, Hate Crime, violence and other conducts involving abusing authority, dereliction of duty and playing favoritism and committing irregularities etc.

5) Racism and racial discrimination were in themselves serious violations of human rights. During the time of my case, especially during the time of Pandemic (Covid-19), the severe bullying reaches an extreme in the Courts of Manhattan. The Asian litigant-Petitioner Yi Sun was treated with great cruelty by the prejudicial (African-American) Judge(s). I have reasonable doubt to believe that the privileged bullies' action(s) is Mobbing under racial prejudice against the helpless survivor (disadvantaged ethnic minority).

6). In the original District Court Docket: **USDC NYSD 2018 CV11002**, the African-American female Judge knowingly employed a new legal subterfuge to justify these privileged Defendants (especially the serial rapist). In the "last series Orders" and the original 'Memorandum Opinion and Order' and "ORDER OF DISMISSAL", It is a biased legal document that raised/played hob with Material Statement & Material Facts. And the Judge always tried to citing case laws to support the insanity (under her strong prejudice) after she/they intentionally put the helpless special victim (in the sexual violence) into a worst position. The Judge always cited a pervious case to support her argument on

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prejudication, after the litigant Yi Sun was/is positioned as a “villain” or a “worst character” in here. The Judge tried the best to justify these privileged defendants (especially the serial rapist). **But generally**, Case-law is a kind of law while cases are only the materials of which case-law is made. Courts will not turn to case decisions for law if a statute is directly in point. Point out, conventional legal reasoning and citation of precedents to be to be taking respecting the fact as prerequisite. When making the Order/Decision/Judgment in a case, the Judge should respect the objectivity and accuracy of the facts and should protect the justice of judicature and judiciary authority.

7). Fairness and justice in a jurisdiction are realized case by case being settled properly. Law was an order of peace founded on fairness.

“Laws of the United states” (or and Constitution) includes ‘Due process protections’, it has/have provisions on complaint, answer, counterclaim, interim protecting measures, trial, judgment and appeal of the civil procedure or and criminal cases. Everybody is equal before the law; the court must ruled in a clear and precise way a simple principle, this principle should be is equality before the law. The hearing must conform to the principles of natural justice.

It is well known that ‘the District Courts’ official website’ is Authority Site in public. All of the Orders/Judgments/Decisions made by the ‘United States District Court’ has been continue to be publicized on its official website, except those concerning national secrets, trade secrets or personal privacy. It aims to tell the Netizen /reader the true facts of cases, to know/find out the whole story/stories by the Federal Court. The official website has a very specific purpose: increase judicial transparency; Laws protect people take their rights to be informed; and ‘Judicial supervision’ (The “special supervisors of law” shall have the right to exercise legal supervision over civil/criminal proceedings.) The purpose was to define the constitutional position and protecting the justice of judicature. Unfortunately, the SDNY judge acted from expediency, not from principle. She/they attained her/their goal at the expense of others, (and impair the good name of ‘United States District Court, Southern District of New York’). It is tangential to the Federal Court’s main objective.

Now Plaintiff respectfully request that the U.S. Attorney Office and U.S. Department of Justice can watch on all this in the criminal matters.

33. JURY DEMAND

Plaintiff Yi Sun hereby demands a trial by jury on all issues so triable pursuant to Rule 38 of the Federal Rules of civil Procedure.

34. CONCLUSION

Law was an order of peace founded on fairness. Everybody is equal before the law. Our Court mustn’t wrong innocent people and palliative enemies. Anyhow, Rape (sexual assault) is a vile and loathsome crime. The privileged offenders (defendants) and their accomplices must not be allowed to exploit loopholes in existing law and thus escape responsibility for their actions. The U.S. government takes honesty and trust very seriously. No one is above the law.

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WHEREFORE, the Petitioner *Pro Se* respectfully request that the Court and Federal Government and Highest Judiciary et al watch on all these Verified Statement and “Justice for Yi Sun”; I prays that the Honorable Judge grant my request and Motions, and that I have such other and further relief as may be just and proper.

Respectfully submitted

Dated: November 22, 2023
New York, New York
(Amended Complaint)

November 27, 2023

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